

EXHIBIT E [Doc. 1-12]
(Redacted Exhibit to Complaint)



6300 Enterprise Lane | Madison, WI 53719 | 608-271-1176 | qualtim.com

June 4, 2024

Mr. Stephen E. Kabakoff
Miller & Martin, PLLC
1180 W. Peachtree St., NW, Ste 2100
Atlanta, GA 30309-7706

Via Email at stephen.kabakoff@millermartin.com and Deloris.Lanus@millermartin.com

Dear Stephen:

Thank you for your June 3, 2024 email communication, which follows:

From: Stephen Kabakoff <Stephen.Kabakoff@millermartin.com>
Sent: Monday, June 3, 2024 2:11 PM
To: Kirk Grundahl <kgrundahl@qualtim.com>
Subject: RE: Paragon Component Systems, LLC (Paragon) - Requested Response from Qualtim and Inspired Pursuits

Hi Kirk,

Thank you for your additional letter that you sent this morning. I have forwarded it to our client. However, you again provided an unreasonably quick deadline for response by noon CDT tomorrow, which will not give us sufficient time to discuss your new demands with our client. It appears that you are asking for certain confirmations from Paragon that you had not previously demanded. Again, we will review your new demands with our client and respond as soon as practicable.

In addition, we request further clarification based on your letter that you sent today.

First, your letter states that you are "100 percent confident that we do not need to discuss anything further with respect to copyright, intellectual property (IP), trade secrets (TS) and the engineering business we have been transacting with Dan since 2009." And your new demands all relate to Paragon's "conformance with all professional engineering laws."

Can you please confirm if your statement that you are "100 percent confident that we do not need to discuss anything further with respect to copyright, intellectual property (IP), trade secrets (TS) ..." indicates that you agree that Paragon is the sole owner of all IP and TS rights in the Paragon Truss Software and that the outstanding dispute is limited to Paragon's compliance with unspecified "engineering laws"? Or is it your position that 100 percent confidence relates to your position previously stated in your letters? This clarification is needed so we can tailor our client's response to the disputed issue(s).

Second, your new letter includes an entire section relating to Inspired Pursuits and the "CCI-DrJ-Paragon team." Can you please explain what demands (if any) you are making of CCI? It is our position that CCI, Paragon, and Inspired Pursuits are completely independent business entities. While you have made demands on Paragon, we are unaware of any specific demands that you are making against CCI or Inspired Pursuits. Please clarify if there are any demands on CCI or Inspired Pursuits that are separate from your demands on Paragon.

I look forward to your responses to the two questions above.

With best regards,

Stephen

I'll do my best to provide clarity with respect to known facts pursuant to all past communication, your current email, and all future communication regarding this subject in as concise a list as possible:



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[REDACTED]

With this letter, and your subsequent confirmation of actions that will be taken by your client, pursuant to Qualtim's letters of May 29, 2024 and June 3, 2024 that are specific to professional engineering law and the Federal Trade Commission, Qualtim and DrJ believe that the engineering related matters are fully resolved. In addition, pursuant to all stipulations provided above, no further action will be needed by Qualtim, DrJ or CBI.

[REDACTED]

Thank you very much.

Respectfully,

A handwritten signature in cursive script, appearing to read "Kirk Grundahl".

Kirk Grundahl, P.E. (47 states)
President
608-217-3713

PS Please note that nothing contained in this letter, nor any act or omission to act by IP-LLC, Qualtim, DrJ and/or CBI, is intended or should be deemed a waiver or modification of any rights or remedies that IP-LLC, Qualtim, DrJ and/or CBI may have at law or in equity, and all such rights are expressly reserved.

